# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF WEST VIRGINIA AT CLARKSBURG

ASTRAZENECA AB and ASTRAZENECA PHARMACEUTICALS LP,

Plaintiffs,

v.

MYLAN PHARMACEUTICALS INC., and KINDEVA DRUG DELIVERY L.P.,

Defendants.

Civil Action No. 1:18-CV-193

C/W 1:19-CV-203

(Judge Keeley)

# MOTION FOR REDACTION REGARDING MARCH 22, 2022 STATUS CONFERENCE TRANSCRIPT

Defendants Mylan Pharmaceuticals Inc. and Kindeva Drug Delivery L.P., by their undersigned counsel, hereby move the Court for an order directing the court reporter to redact portions of the transcript of the telephonic status conference held on March 22, 2022, in the above -styled action. Specifically, Defendants request that the transcript be redacted as identified in the copy of the excerpt of the hearing transcript attached as Exhibit A. The proposed redactions on the following pages:

Page 8, Lines 22 to 25;

Page 18, Line 6;

Page 21, Lines 6 and 9;

Page 23, Line 15;

Page 25, Line21;

Page 27, Lines 3 and 11;

Page 28, Lines 8 and 15;

Page 29, Line 10;

Page 30, Line 20; and

Page 31, Line 9.

The redacted portions of the transcript disclose the technical details of Mylan's ANDA products, which include confidential details of Mylan's ANDA products, which information is

highly sensitive and not public. The redactions also include information related to Defendants' development expenditure which are confidential and have been disclosed only pursuant to the Court's protective order. <sup>1</sup>

For the foregoing reasons, Defendants requests that the Court grant its motion and direct the court reporter to redact from the public transcript the material that has been redacted in the proposed form of the redacted transcript attached as Exhibit A.

Respectfully submitted this 19th day of April, 2022.

## Of Counsel:

Shannon M. Bloodworth
SBloodworth@perkinscoie.com
Brandon M. White
BMWhite@perkinscoie.com
Maria A. Stubbings
MStubbings@perkinscoie.com
Michael A. Chajon
MChajon@perkinscoie.com
Christopher D. Jones
CDJones@perkinscoie.com
700 Thirteenth Street, N.W., Suite 600
Washington, D.C. 20005-3960

David L. Anstaett
DAnstaett@perkinscoie.com
Emily J. Greb
EGreb@perkinscoie.com
Brandon M. Lewis
BLewis@perkinscoie.com
Michael R. Laing
MLaing@perkinscoie.com
PERKINS COIE LLP
33 East Main Street, Suite 201
Madison, WI 53703
Phone: (608) 663-7460

Phone: 202.654.6200 Facsimile: (202) 654.6211 By: /s/ Gordon H. Copland

Gordon H. Copland (WV Bar #828) gordon.copland@steptoe-johnson.com William J. O'Brien (WV Bar #10549) william.obrien@steptoe-johnson.com STEPTOE & JOHNSON PLLC 400 White Oaks Boulevard Bridgeport, WV 26330 Phone: (304) 933-8000

Attorneys for Defendants Mylan Pharmaceuticals Inc. and Kindeva Drug Delivery L.P.

<sup>&</sup>lt;sup>1</sup> If the Court would find it helpful, Defendants can readily provide the Court with a copy of the transcript in which the proposed redactions are highlighted, either by providing the same directly to chambers or filing it under seal.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of April, 2022, I served the foregoing "Motion for Redaction Regarding March 22, 2022 Status Conference Transcript" with the clerk of the Court by using the CM/ECF system, which will send electronic notice to the following counsel of record:

Gary M. Rubman grubman@cov.com Christopher N. Sipes csipes@cov.com Matthew Kudzin mkudzin@cov.com Megan P. Keane mkeane@cov.com Douglas A. Behrens dbehrens@cov.com Einar Stole

EStole@cov.com

Kyle Chow

kchow@cov.com

Nafissa Pio npio@cov.com Simeon Botwinick

sbotwinick@cov.com

Philip S. May pmay@cov.com

COVINGTON & BURLING LLP

One City Center 850 Tenth St. NW, Washington, DC 20001 David I. Berl dberl@wc.com

Kevin Hoagland-Hanson khoagland-hanson@wc.com

Jessica Palmer Ryen jryen@wc.com

Jessica Bodger Rydstrom jrydstrom@wc.com

WILLIAMS & CONNOLLY LLP

725 Twelfth St., NW Washington, DC 20005

James Companion ifc@schraderlaw.com Sandra K. Law

skl@schraderlaw.com

Frank X. Duff

fxd@schraderlaw.com

SCHRADER COMPANION DUFF & LAW,

**PLLC** 

401 Main Street

Wheeling, WV 26003

Attorneys for Plaintiffs AstraZeneca AB and AstraZeneca Pharmaceuticals LP

### /s/ Gordon H. Copland

Gordon H. Copland (WV Bar #828) gordon.copland@steptoe-johnson.com STEPTOE & JOHNSON PLLC 400 White Oaks Boulevard Bridgeport, WV 26330 Phone: (304) 933-8000